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January 14, 2025

VIA ECF

Honorable J. Paul Oetken
United States District Court
40 Foley Square
Room 2101
New York, NY 10007

Hiteks Solutions, Inc. v. Citibank, N.A. et al.
Case No. 1:25-cv-00200 (JPO)(RWL)
Request for Extension of Time to Respond to the Complaint

Dear Judge Oetken:

We are counsel to defendant Citibank, N.A. (“Citibank”) in the above-referenced action. Citibank removed this action from the Supreme Court of the State of New York, County of New York on January 9, 2025. Under Fed. R. Civ. P. 81(c)(1)(C) Citibank is required to answer or otherwise respond to the Complaint within 7 days after the notice of removal is filed. Accordingly, Citibank has until January 16, 2025 to respond.

We make this application to extend Citibank’s time to respond to the Complaint for 30 days, to and including February 18, 2025. This is the first request for an extension. I have communicated with Plaintiff’s counsel Michael DeBenedictis via email and he consents to this extension.

Granting our application would not affect any deadlines in this case.

Respectfully submitted,

/s/ A.J. Bosco

A.J. Bosco

CC: Micheal DeBenedictis via email: mjd@debenedictislaw.com